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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ALLEGIANT TRAVEL COMPANY,

Plaintiff,

v.

R2 SOLUTIONS LLC,

Defendant.

Case No. 2:22-cv-00828-CDS-BNW

**UNOPPOSED MOTION TO EXTEND R2
SOLUTIONS LLC'S TIME
TO SERVE ITS DISCLOSURE OF
ASSERTED CLAIMS AND
INFRINGEMENT CONTENTIONS AND
RESPONSES TO PLAINTIFF'S NON-
INFRINGEMENT CONTENTIONS**

(First Request)

1 Defendant R2 Solutions LLC (“Defendant”) brings this unopposed motion to extend the
2 time for it to serve its Disclosure of Asserted Claims and Infringement Contentions and responses
3 to Plaintiff Allegiant Travel Company’s (“Plaintiff”) non-infringement contentions. To this end,
4 Defendant requests, and Plaintiff does not oppose, an extension of seven (7) days to and including
5 **October 25, 2022** to do so. Pursuant to LR IA 6-1, this is the first request to extend the time to
6 serve Defendant’s Disclosure of Asserted Claims and Infringement Contentions and responses to
7 Plaintiff’s non-infringement contentions.

8 This request is not made for the purpose of delay. R2 previously filed a motion to stay
9 discovery pending resolution of its motion to dismiss, which, if granted, would have stayed the
10 deadline for R2 to serve its Disclosure of Asserted Claims and Infringement Contentions and
11 responses to Plaintiff’s non-infringement contentions. The Magistrate Judge denied R2’s motion
12 to stay on October 13, 2022, five days before R2’s current deadline. Patent cases are complex.
13 This case involves seven distinct patents, at least three of which have not been litigated in prior
14 patent infringement litigation brought by Defendant in the United States District Court for the
15 Eastern District of Texas. As such, there is much for Defendant’s counsel to investigate, analyze,
16 collect, and consider in creating and preparing Defendant’s Disclosure of Asserted Claims and
17 Infringement Contentions and responses to Plaintiff’s non-infringement contentions. In light of the
18 short amount of time between the Magistrate Judge’s denial of R2’s motion to stay and R2’s
19 deadline, and the amount of work involved with preparing infringement contentions, R2
20 respectfully submits that there is good cause for the requested extension. Defendant has conferred
21 with counsel for Plaintiff, and Plaintiff does not oppose the requested extension.

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1 For the foregoing reasons, Defendant respectfully asks that the Court grant this unopposed
2 motion re-setting Defendant's deadline to serve its Disclosure of Asserted Claims and
3 Infringement Contentions and responses to Plaintiff's non-infringement contentions to October 25,
4 2022.

5 Dated this 14th day of October, 2022.

6 HUTCHISON & STEFFEN, PLLC

7 /s/ Brenoch Wirthlin

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28 *Attorneys for Defendant*
R2 Solutions LLC

ORDER

IT IS SO ORDERED

DATED: 2:58 pm, October 17, 2022



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of October, 2022, I caused a true and correct copy of the foregoing **UNOPPOSED MOTION TO EXTEND R2 SOLUTIONS LLC'S TIME TO SERVE ITS DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS AND RESPONSES TO PLAINTIFF'S NON-INFRINGEMENT CONTENTIONS** to be submitted electronically for filing and service with the United States District Court for the District of Nevada via the Electronic Filing System to the following:

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